

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF GEORGIA**  
**AUGUSTA DIVISION**

ERIC JOSEPH LOVE

Plaintiff

v.

AUGUSTA-RICHMOND COUNTY, et al.

Defendants

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Case No. 1:19-cv-0120-JRH-BKE

**RULE 26(f) REPORT**

1. Date of Rule 26(f) conference: September 24, 2019

2. Parties or counsel who participated in conference:

M. Anthony Mangini for Plaintiff

Tameka Haynes for Defendants

3. If any defendant has yet to be served, please identify the defendant and state when service is expected.

N/A

4. Date the Rule 26(a)(1) disclosures were made or will be made:

October 22, 2019

5. If any party objects to making the initial disclosures required by Rule 26(a)(1) or proposes changes to the timing or form of those disclosures,

(a) Identify the party or parties making the objection or proposal:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(b) Specify the objection or proposal:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

6. The Local Rules provide a 140-day period for discovery. If any party is requesting additional time for discovery,

(a) Identify the party or parties requesting additional time:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

(b) State the number of months the parties are requesting for discovery:

\_\_\_\_\_

months

(c) Identify the reason(s) for requesting additional time for discovery:

\_\_\_\_\_ Unusually large number of parties

\_\_\_\_\_ Unusually large number of claims or defenses

\_\_\_\_\_ Unusually large number of witnesses

\_\_\_\_\_ Exceptionally complex factual issues

\_\_\_\_\_ Need for discovery outside the United States

\_\_\_\_\_ Other: \_\_\_\_\_

(d) Please provide a brief statement in support of each of the reasons identified above:

\_\_\_\_\_

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7. If any party is requesting that discovery be limited to particular issues or conducted in phases, please

(a) Identify the party or parties requesting such limits:

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(b) State the nature of any proposed limits:

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8. The Local Rules provide, and the Court generally imposes, the following deadlines:

|   |   |
|---|---|
| Last day for filing motions to add or join parties or amend pleadings | 60 days after issue is joined   |
| Last day to furnish expert witness report by plaintiff                | 60 days after Rule 26(f) conference   |
| Last day to furnish expert witness report by a defendant              | 90 days after Rule 26(f) conference (or 60 days after the answer, whichever is later) |

Last day to file motions

30 days after close of  
discovery

If any party requests a modification of any of these deadlines,

- (a) Identify the party or parties requesting the modification:

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- (b) State which deadline should be modified and the reason supporting the request:

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9. If the case involves electronic discovery,

- (a) State whether the parties have reached an agreement regarding the preservation, disclosure, or discovery of electronically stored information, and if the parties prefer to have their agreement memorialized in the scheduling order, briefly describe the terms of their agreement:

The parties will participate in good faith to preserve potentially discoverable

electronic information.

- (b) Identify any issues regarding electronically stored information as to which the parties have been unable to reach an agreement:

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10. If the case is known to involve claims of privilege or protection of trial preparation material,

(a) State whether the parties have reached an agreement regarding the procedures for asserting claims of privilege or protection after production of either electronic or other discovery material:

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(b) Briefly describe the terms of any agreement the parties wish to have memorialized in the scheduling order (or attach any separate proposed order which the parties are requesting the Court to enter addressing such matters):

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(c) Identify any issues regarding claims of privilege or protection as to which the parties have been unable to reach an agreement:

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11. State any other matters the Court should include in its scheduling order:

N/A

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12. The parties certify by their signatures below that they have discussed the nature and basis of their claims and defenses and

the possibilities for prompt settlement or resolution of the case.  
Please state any specific problems that have created a hindrance  
to the settlement of the case:

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This 8 day of October, 2019.

Signed: /s/ Nathan W. Kellum  
*Attorney for Plaintiff*

/s/Tameka Haynes  
*Attorney for Defendant*